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*Attorneys for Irving H. Picard, Trustee  
for the Substantively Consolidated SIPA Liquidation  
of Bernard L. Madoff Investment Securities LLC  
and the Chapter 7 Estate of Bernard L. Madoff*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION  
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT  
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-01789 (CGM)

SIPA Liquidation

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the  
Substantively Consolidated SIPA Liquidation  
of Bernard L. Madoff Investment Securities  
LLC and the Chapter 7 Estate of Bernard L.  
Madoff,

Plaintiff,

v.

UKFP (ASIA) NOMINEES LIMITED f/k/a  
TOWRY LAW (ASIA) NOMINEES  
LIMITED,

Defendant.

Adv. Pro. No. 12-01566 (CGM)

**STIPULATION AND ORDER**

Irving H. Picard (the “Trustee”), as trustee for the substantively consolidated liquidation of the business of Bernard L. Madoff Investment Securities LLC under the Securities Investor Protection Act, 15 U.S.C. §§ 78aaa–III, and the chapter 7 estate of Bernard L. Madoff, and defendant UKFP (Asia) Nominees Limited, f/k/a Towry Law (Asia) Nominees Limited, (“Defendant”), by and through their respective, undersigned counsel, hereby stipulate and agree as follows:

**WHEREAS**, on April 26, 2012, the Trustee filed a complaint (the “Complaint”) in the above-captioned adversary proceeding against Defendant to recover subsequent transfers Defendant allegedly received from Fairfield Sentry Limited, ECF No. 1.

**IT IS MUTUALLY AGREED AND STIPULATED**, by and between the Trustee and Defendant, and **SO ORDERED**, by the Court that:

1. Defendant shall respond to the Complaint by July 15, 2022. If Defendant files a motion to dismiss the Complaint, such motion shall set forth any and all grounds for dismissal at the pleading stage. The Trustee shall respond to the motion by September 13, 2022, and the Defendant shall file its reply by October 13, 2022.

2. If Defendant files such a motion to dismiss the complaint, the parties shall seek oral argument on the motion at the Court’s first available convenience.

3. The above deadlines granted by this Stipulation are without prejudice to either party seeking future extensions of time.

4. Except as expressly set forth herein, the parties to this Stipulation reserve all rights, arguments, claims, objections and/or defenses they may have and entry into this Stipulation shall not impair or otherwise affect any such rights, arguments, claims, objections and/or defenses.

Dated: New York, New York  
April 13, 2022

**BAKER & HOSTETLER LLP**

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*Attorneys for Plaintiff Irving H. Picard,  
Trustee for the Liquidation of Bernard L.  
Madoff Investment Securities LLC and the  
Chapter 7 Estate of Bernard L. Madoff*

**MAYER BROWN LLP**

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*Attorneys for Defendant UKFP (Asia)  
Nominees Limited*

**SO ORDERED.**

**Dated: April 15, 2022  
Poughkeepsie, New York**



/s/ Cecelia G. Morris

**Hon. Cecelia G. Morris  
U.S. Bankruptcy Judge**